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THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET NEW YORK, NY 10007 J. KEVIN SHAFFER

Assistant Corporation Counsel Labor & Employment Law Division (212) 356-1105 jshaffer@law.nyc.gov

August 28, 2020

BY ECF

JAMES E. JOHNSON

Corporation Counsel

Hon. Valerie E. Caproni United States District Judge United States District Court Southern District of New York 40 Foley Square, Room 240 New York, New York 10007

Re: Ricardo Dolcine v. Police Officer Richard Hanson, and Police Officer Kerin

Donahue

Docket No. 17 Civ. 4835 (VEC) (JLC)

Dear Judge Caproni:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, attorney for Defendants in the above-referenced action. Pursuant to the Court's Order dated August 27, 2020 (ECF Dkt. No. 111), please see the attached, redlined copies of Defendants' Amended Local Rule 56.1 Statement (ECF Dkt. No. 112) and Defendants' Amended Memorandum of Law in Support of Defendants' Motion for Summary Judgment (ECF Dkt. No. 113). Additionally, please see the attached, corrected version of Exhibit P to the Shaffer Declaration.

Respectfully submitted,

|s| J. Kevin Shaffer

J. Kevin Shaffer Assistant Corporation Counsel

Encl.

cc: Elefterakis, Elefterakis & Panek (by ECF)

Attorneys for Plaintiff